

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

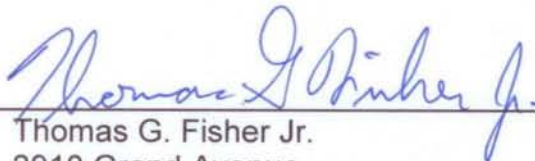
In the Matter of:	
High-Cost Universal Service Support	WC Docket No. 05-337
Federal-State Joint Board on Universal Service	CC Docket No. 96-45

**REPLY COMMENTS BY THE RURAL IOWA INDEPENDENT  
TELEPHONE ASSOCIATION ON RECOMMENDATION FOR AN  
IMMEDIATE INTERIM CAP ON SUPPORT FOR COMPETITIVE  
ELIGIBLE TELECOMMUNICATIONS CARRIERS**

In its initial comments, RIITA supported the idea of an interim cap, though expressed concerns and support of Commissioner Copps's dissent. In reviewing the comments filed in this docket, RIITA expressly joins in all of the recommendations made by the National Telecommunications Cooperative Association, both with regard to an interim CETC USF cap and in its additional comments, including elimination of the identical support rule, that competitive carriers have their support based on their own costs, that a meaningful public interest test be imposed for CETC designations, that the contributors be expanded to include broadband service providers and that the existing regulatory cap imposed on rural ILECs be removed.

These changes, as discussed in NTCA's comments and in earlier comments filed by RIITA are necessary to maintain the viability and fairness of the Universal Service Fund.

**PARRISH KRUIDENIER DUNN BOLES  
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